

EXHIBIT A

RECEIVED

OCT 20 2020

SCI-FRACKVILLE
Superintendent's Office

To : the Schuylkill county Prothonotary
Bridget Miller,

Re: Cieniawa, Vs. Brittain, Civil Action #
S - 305 - 20

Dated 10-11-2020

I was forced to use this yellow paper, I am also IFP, can you please file this supplemental complaint,

SCHUYLKILL COUNTY
SUPERINTENDENT'S OFFICE
10-11-2020
S-305-20
11-11-2020

Also, can you make 9 copies of this summons and Notice, And the complaint, seal it, sign it, and issue your service upon these defendants - I have NO access or way to make copies -

Your, Service upon as required;

To: CO1. OBOYLE, CO1. STORM, CO1. GORNEL, CO1.
MORRIS, CO3. SIMPSON, SUPERINTENDANT BRITTAIY,
DUPNTY GOURLEY AND CO4 REESE ALL AT
SCI-FRACKVILLE 1111 ALTMONT BOULEVARD
FRACVILLE PA 17931
SERVICE UPON TO :

~~RECEIVED~~ CO:CHIEF OFFICIAL OF THE OFFICE
OF SPECIAL INVESTIGATIONS AND INTEL-
IGENCE "AS JOHN DOE," AT 1920 ~~PA 17050~~ ♦
Technology Parkway, ~~PA~~ Mechanicsburg
PA 17050

Please Return A Service copy , signed,
stamped and dated, with a Docket entry
sheet attached, after you enter this complaint
and summons into the docket, and service my
summons ~~Frank~~ And complaint by mail as
I indicated -

Please & Thank You -

Also, can you send me 3 of your
precipice forms for demanding to the court
adm. to attach to a few motions im doing
up??

Thank you

JASON Cieniawa #M20869
Sci-Frakville
1111 Altamount Boulevard
Frakville PA 17931

1S/J

SCHUYLKILL COUNTY COURT OF COMMON PLEAS - PENNSYLVANIA
CIVIL DIVISION

JASON CIENIAWA

| 5-305-2020

VS.

KATHY BRITTAI^N, ET AL.

SUMMONS

TO FIRST SHIFT OFFICER OBOYLE, AND
TO THE 2ND. SHIFT OFFICERS WORKING IN THE
RESTRICT HOUSING UNIT OF EB BLOCK, CO 3 SIMPSON,
CO 1. STORM, CO 1. GORNBL, CO 1. MERRIS AND SEVERAL JOHN
DOES OF A CO 1, CO 2, CO 3, RANKS - SUPERINTENDANT
KATHY BRITTAI^N, DEPUTY SUPERINTENDANT MICHAEL
GOURLEY, SECURITY CAPTAIN REESE, IN YOUR OFFICAL
AND INDIVIDUAL CAPACITIES, EMPLOYEES OF SCI
FRACKVILLE, 1111 ALTAMOUNT BOULEVARD, FRACKVILLE,
PA. 17931 - AND TO CHIEF OFFICER OF THE OFFICE
OF SPECIAL INVESTIGATIONS - 1920 TECHNOLOGY PKWY., MACLAFFERTY, PA 17050,
YOU ARE HEREBY SUMMONED AND REQUIRED TO
SERVE UPON THE PLAINTIFF JASON CIENIAWA,
M20869- 1111 ALTAMOUNT BOULEVARD, FRACKVILLE, PA.
17931 - AND UPON THE COURT AT 401 N. AND STREET,
POTTSVILLE, PA. 17901 - PROTHONOTARY'S OFFICE, AN'
ANSWER TO THE COMPLAINT WHICH IS HEREBWITH
SERVED UPON YOU - WITHIN 20 DAYS AFTER
SERVICE OF THIS SUMMONS UPON YOU --- IF YOU
FAIL TO DO SO A JUDG-MNT BY DEFALUT WILL
BE TAKEN AGAINST YOU FOR THE RELIEF AS IS
DEMANDED IN THIS COMPLAINT ---

PROTHONOTARY OFFICE
SCHUYLKILL COUNTY, PA
2020 OCT 16 PM 1:16

PROTHONOTARY

DATED: — / — / —

SCHOOLVILLE COUNTY COURT OF COMMON PLEAS - PENNSYLVANIA
CIVIL DIVISION

JASON CRENIAWA

vs.

KATHY BRITTAINE, ET AL.

5-305-2020

SCHOOLVILLE COUNTY COURT OF COMMON PLEAS - PENNSYLVANIA
CIVIL DIVISION
OCT 16 2020
17931SUPPLEMENTAL COMPLAINT

AND NOW THIS 11TH DAY OF OCTOBER 2020
 SUMMONS THE FOLLOWING DEFENDANTS TO ANSWER
 TO THE FOLLOWING CHARGES AS MADE AGAINST
 AS FOLLOWS -

- 1). PLAINTIFF IS JASON CRENIAWA NO. MZ0869,
 OF SCI - FRACKVILLE 1111 ALTAMONT BOULEVARD,
 FRACKVILLE PA. 17931...
- 2). PLAINTIFF FILED AN ORIGINAL CIVIL ACTION
 BY SUMMONS ON 3-22-2020, AT WHICH WAS STRIKED
 AND AMENDED AND SERVED ON THE ORIGINAL
 DEFENDANTS ON 5-13/14-2020...
- 3). PLAINTIFF HAS FILED SEVERAL SUPPLEMENTAL
 COMPLAINTS SINCE - FOR RETALIATION, OFFICIAL
 ABUSE AND HARASSMENT - TO WRT THESE FOLLOW-
 ING CLAIMS ARE OF THAT NATURE -
- 4). PLAINTIFF UPTIL FEBRUARY OF 2020 WAS
 IN MID PROCESS OF EXHAUSTING IN HOUSE
 GRIEVANCE REMEDIES FOR SEVERAL INCIDENTS,
 AND SOON AFTER BECAME A TARGET OF
 HARASSMENT TO WRT SEVERAL DEFENDANTS HAVE
 BEGAN TO COHORT TOGETHER WITH THEIR CO-
 WORKERS IN A CAMPAIGN OF DAILY ACTS OF
 CELL SEARCHES WEEKLY AND DESTROYING AND STEALING
 PLAINTIFFS PROPERTY, TO CONSISTENTLY REFUSING
 TO OPEN PLAINTIFFS DOOR FOR MEALS, YARDS,
 PASES - ETC - TO INCLUDE DEFENDANT HANNON
 IN 3-4-2020 AT PLAINTIFFS DOOR QUOTING HIS
 WORDS - HE WILL JURGE UP FALSE CONDUCTS ON
 PLAINTIFF TO BURY PLAINTIFF IN THE
 HOLE SOLITARY CONFINEMENT FOR SO LONG
 WITH NOTHING AND NO OUT SIDE CONTACT
 UNTIL PLAINTIFF FORGETS HIS NAME -
- 5). PLAINTIFF REMAINED IN FEAR FOR HIS
 LIFE, SAFETY AND HEALTH SINCE DEFENDANT
 HANNON MADE THAT THREAT - TO WRT
 AN ACCUMULATION OF ON GOING ACTS AS
 STATED IN THE ~~MAX~~ AMENDMENT AND THE
 SEVERAL SUPPLEMENTAL COMPLAINTS LISTED ABOVE.

6). PLAINTIFF ON JULY 20TH, 2020 BY U.S. MAIL
 SENT THE OFFICE OF INTERNAL AFFAIRS,
 SPECIAL INVESTIGATIONS AND INTELLIGENCE
 AT CENTRAL OFFICE - A LETTER OUTLINING
 SEVERAL ISSUES THAT ARE ALL PART OF
 THIS CIVIL ACTION - THAT THE PLAINTIFF
 KNOWS SEVERAL OFFICERS AND DATED
 TWO NURSES WHO WORK AT SCI-FRACK-
 VILLE, AND PRIOR TO HIS IMPRISONMENT
 HERE HE AND HIS FAMILY HAD SEVERAL
 ISSUES, A FEW VIOLENT CONFLICTS WITH
 AND IS MOST LIKELY A MAJOR FACTOR OF
 A LOT OF THE HARASSMENT AND ABUSE AGAINST
 PLAINTIFF -- BUT, SOME HOW DEFENDANT
 REESE OF SCI-FRACKVILLE ENDED UP WITH
 SAID LETTER ON 7-21-2020, AND PUT THE
 PLAINTIFF IN THE RHU SOLITARY CONFIN-
 EMENT UNIT -- CAPTAIN REESE CONDUCTED A
 INVESTIGATION AND ON 09-11-2020 PUT
 PLAINTIFF IN FOR A STAFF SEPARATIONAL
 SECURITY TRANSFER --

7). SOON AFTER PLAINTIFF WAS PLACED IN
 THE HOLE ON SOLITARY CONFINEMENT ON 24/
 7 LOCK DOWN 07-31-2020 SEVERAL OFFICERS
 BEGAN TO BURN PLAINTIFF FOR SHOWERS, YARDS,
 LAW LIBRARY AND EVERYTHING ELSE - SOON
 AFTER 09-11-2020 THE GUARDS BEGAN A CAMPAIGN
 TO ISSUE PLAINTIFF MISCONDUCT - 5 TO DATE,
 FOR THINGS PLAINTIFF IS NOT DOING - DEFEND-
 ANT SIMSON TOLD PLAINTIFF TO HIS FACE,
 THEY MEANING THE DEFENDANTS - INTEND TO
 BURY PLAINTIFF IN MISCONDUCTS - BECAUSE
 IT IS STANDARD DOC PROCEDURE THAT AN INMATE
 MUST COMPLETE HIS MISCONDUCT TIME BEFORE
 TRANSFERRED -- DEFENDANT SIMSON HAS WRITTEN 3
 OF THESE FALSE CONDUCT CHARGE REPORTS HIM
 SELF AS A SUPPLEMENTLY FILED COMPLAINT AND
 SUMMONS INDICATES -- FILED RECENTLY -- DEF.
 SIMSON HAS BEEN PARTICIPATED WITH DEFENDANT
 SMOKE RECENTLY IN AN ACT OF DESTROYING
 AND STEALING LEGAL DOCUMENTS --

TO WIT IS A BASIC HISTORY OF FACTS -
 AND NOW PLAINTIFF CHARGES THAT -

8). DEFENDANTS SIMSON, MORRIS, GORNELL, STORM
 AND SEVERAL JOHN DOES ON AND SHIFT WORKING
 THE RHU/HOLE ON BB-BLOCK WHERE PLAINTIFF WAS
 MOVED TO ON 10-06-2020 HAVE DENIED THE DINNER
 MEAL ON AND SHIFT AT 1700 HOURS DAILY SINCE
 10-06-2020 - LEAVING THE PLAINTIFF TO SURVIVE
 ON THE OTHER TWO TINY MEALS AT BREAKFAST
 AND LUNCH - WELL BELOW 1000 CALORIES -- THEY ARE
 FALSELY REPORTING IT SAYING PLAINTIFF IS
 REFUSING THESE MEALS --

9). DEFENDANT SIMPSON HAS NOW FALSEDIED SEVERAL MISCONDUCT REPORTS FOR THREATS AND ABUSIVE LANGUAGE IN THE LAST COUPLE OF WEEKS. DEF. OIBOYDE ISSUED A FALSEDIED REPORT FOR THREATS, AND DEFENDANT MORRIS ISSUED ONE FOR THREATS ON 10-9-2020, 10-6-2020, FALSEDIED LEGAL DOCUMENTS THAT ARE BEING USED TO:

- 1). STOP PLAINTIFFS STAFF SECURITY TRANSFER - THEY ARE OBSTRUCTING AND INTERFERING WITH GOVERNMENTAL FUNCTIONS, BY FALSEDIED MISCONDUCTS IN ORDER TO CAUSE PLAINTIFF TO REMAIN AT THIS PRISON WITH THE SAME, AND BY THE SAME, OFFICERS THAT SECURITY DETERMINED PLAINTIFF NEEDED A SEPARATION AND PROTECTION FROM --- HOW CONVENIENT TOLL THE CONDUCT TIME IS DONE - WHICH BREWS FARAWAY --
- 2). TO DENY PLAINTIFF ACCESS TO SHOWERS, THE LAW LIBRARY, PHONE, VISITS, AND ANY OTHER MOVEMENT OUTSIDE HIS CELL.

10). THESE DEFENDANTS AND A COHORT OF JOHN DOBS ARE STRATEGICALLY CAMPAIGNING - A SERIOUS BREW TO TARGET THE PLAINTIFF. THEY ARE VOUCHING FOR EACH OTHERS LIES AND FALSE REPORTS TO THEIR SUPERIORS AGAINST THE PLAINTIFF TO JUSTIFY THEIR USE OF OBSTRUCTION OF GOVERNMENTAL FUNCTIONS OF THE TRANSFER, ACCESS AND GRIEVANCE SYSTEM, AND THE COURT -- THESE NEW DEFENDANTS SINCE ~~EARLY~~ 07-21-2020, HAVE USED THEIR OFFICIAL POWER TO PURSUE BOTH CRIMINAL AND CIVIL CRIMES OF HARASSMENT, OBSTRUCTION, RETALIATION, FABRICATION OF PHYSICAL EVIDENCE, AND INTIMIDATION BY DOING SO AMOUNTING TO DAILY FEAR OF PLAINTIFFS HEALTH AND WELL BEING, A PSYCHOLOGICAL ABUSE TO WIT PLAINTIFF IS ALREADY A MENTALLY DESTITUTED AND HANDYCAP INDIVIDUAL --

11). PLAINTIFF BEGAN TO ^{CONTINUE} EXHAUSTION GRIEVANCE REMEDIES TWO WEEKS AGO - AND WAS SENT BY DEFENDANT BRITTAIN AND GOURLEY, REBSPB ~~AND~~ ~~THEIR~~ DOE SUPERVISOR. AT ~~CENTRAL OFFICES~~ ~~OF SP~~ WHO ARE SUPERVISORY AND SECURITY OFFICIALS AT THIS PRISON AND ALSO TO JOHN DOE THE CHIEF OFFICER AT THE OFFICE OF SPECIAL INVESTIGATIONS CENTRAL OFFICES, SEVERAL MEMOS AND COMPLAINTS OUT LINING THE FALSE CONDUCT CHARGES AND THESE VIOLATIONS AS STATED HEREIN AND THE THREE OTHER SUPPLEMENTAL COMPLAINTS FILED RECENTLY -

11) CONTINUES - FROM PAGE 4).-

14 REQUESTS, COMPLAINTS TO THE DEFENDANT IN PARAGRAPH 11 HEREBE HAVE IGNORED EVERY LAST COMPLAINT - AND HAVE FAILED TO DO ANYTHING TO STOP, PREVENT OR REPREMAND THE COHORT OF OFFICERS FROM THESE ON GOING ACTS - THE CHIEF OFFICER OF THE SPECIAL INVESTIGATIONS INTERNAL AFFAIRS OFFICE CENTRAL OFFICE, THE CAPT. OF SECURITY REBSE, SUPERVISOR BRITTAINI, DEPUTY CURLEY HAVE ALLOWED THEIR RANKING CO1 CO2 CO3 DEFENDANTS TO CAREY OUT THESE ACTS -

12). PLAINTIFF IS IN SOLITARY CONFINEMENT, DENIED SINCE SEPTEMBER 21, 2020, 12. AT LEAST ONE MEAL A DAY TO WITH AN APPROPRIATE AMOUNT OF CALORIES AND NUTRIENTS ARE DENIED -- SINCE THE ONLY FOOD AVAILABLE IS THE 3 MEALS A DAY + USUALLY SECOND SHIFT AND BY THE CO1, CO2 RANKS -- 2). PLAINTIFF HAS HAD ACCESS TO 3 SHOWERS IN 3 MONTHS. 3). DENIED GRIEVANCE FORMS AND USE OF GRIEVANCE UNTIL TWO WEEKS AGO AND IMMEDIATE RETALIATION AND THREATS AGAINST PLAINTIFF INCREASED TO A POINT PLAINTIFF NO FEARS OFFICERS WILL TRY TO PLAIN CONTRABAND OR OTHERWISE FALSIFY CRIMINAL CHARGES AND OR CAUSE THE DEATH OF PLAINTIFF. 4). PLAINTIFF HAS BEEN DENIED HIS ASTHMA MEDICATION FOR 7 MONTHS, HAS BEEN LEFT TO SUFFER DENIED MEDICAL FOR SEVER PAIN IN HIS BACK NECK AND LEGS AND HEAD FROM SPINAL FRACTURES AND NERVE DAMAGE. 5), PLAINTIFF IS SUFFERING HEAD BRAIN TRAUMA FROM TWO FALLS OFF A TOP BUNK OF DIZZINESS, LIGHTHEADEDNESS, AND DROWNINGNESS, IS BARELY ABLE TO SET UP OR MOVE DO TO STIFFNESS AND PAIN, AND FOR ABOUT 10 MONTHS SUPERVISORY AND SECURITY OFFICIALS HAVE IGNORED AND FAILED TO TAKE MEASURES TO STOP THESE ACTS AND CAUSE CORRECT CARE -

13). DUE TO THE CIRCUMSTANCES IN WHOLE, THE PLAINTIFF SHOULD HAVE BEEN GIVEN AN IMMEDIATE TRANSFER OUT OF SCI-FRACKVILLE, NOT LEFT HERE TO THESE DEFENDANTS ON GOING VIOLATIONS, AND LEFT TO HAVE THE SAME OFFICERS THAT SECURITY SAID PLAINTIFF NEEDED PROTECTION AND SEPARATION FROM, TO BEABLE TO HAVE THEM AND THEIR FELLOW BUDDY CO-WORKERS BUCK THE SYSTEM BY ISSUING FALSE MISCONDUCTS IN ORDER TO STOP PLAINTIFF'S TRANSFER.

14). TO WRT PLAINTIFF CHARGES:
 SUPERINTENDANT BRITTAINE AND DEPUTY GOURLEY
 WITH INTENTIONAL DERELICTION OF DUTY
 AS SUPERVISORY POSITION - A NEGIGENCE
 TO ALLOW PHYSICAL AND PSYCHOLOGICAL DAMAGES,
 BY YOUR OFFICERS YOUR SUPPOSED TO CONTROL AND
 REPREMAND - YOU HAVE IGNORED OVER 30
 REQUESTS AND COMPLAINTS, TO WRT SEVERAL
 FROM CENTRAL OFFICE, FROM PLAINTIFF
 ABOUT SERIOUS ON GOING DENIED MEDICAL,
 DENIED MEALS, DENIED SHOWERS, DENIED
 LAW LIBRARY, BUT AND HAVE PERMITTED
 YOUR OFFICERS TO RETALIATE AND TRY
 TO ENFORCE IMMEDIATE PLAINTIFF FROM PURSUING
 OR REVANCE AND COURT CLAIMS AND REMEDY
 AGAINST YOUS AND YOUR UNDERLINGS -- YOU
 HAVE IGNORED PLAN OUT THREATS AND FALSE
 MISCONDUCT ALLEGATIONS FROM YOUR OFFICERS
 UPON PLAINTIFF --

15). DEFENDANT REESE ~~AND~~ OR FRACKVILLE
 SECURITY AND CHEEF JOHN DOE OF THE
 OFFICE OF SPECIAL INVESTIGATIONS
 CENTRAL OFFICE - YOU HAVE NEGLECTED
 YOUR DUTY TO PROTECT AND PREVENT SER-
 IONS ACTS OF OFFICIAL OBSTRUCTION AND
 INTERFERENCE BY SCI-FRACKVILLE OFFICERS
 FROM SUPERVISORY DOWN TO COI RANKS - YOU
 HAVE NEGLECTED TO TAKE MEASURES TO
 HAVE PLAINTIFF IMMEDIATELY TRANSFERRED
 OUT OF THIS PRISON AND OUT OF THESE
 VIOLENT AND UNHUMAN CONDITIONS -- YOU
 HAVE ALLOWED OFFICIALS HERE TO TAKE
 A COURSE OF ACTION OF FALSIFYING MIS-
 CONDUCTS AGAINST PLAINTIFF FOR THE
 SOLE PURPOSE OF STOPPING PLAINTIFF FROM
 BEING ABLE TO TRANSFER - YOUR ALLOWING
 THE SAME PEOPLE YOU SAID I NEED A
 SEPARATION AND TRANSFER FROM TO A BUSI
 A HOOP HOLE IN DOC CUSTOMS - AND STOP
 PLAINTIFF FROM BEING ABLE TO TRANSFER --

NOTE: A TRANSFER GOES ON HOLD PENDING
 COMPLETION OF MISCONDUCT TIME -- TO WRT
 5 FABRICATED CONDUCT CHARGES HAVE BEEN
 WRITTEN IN THREE WEEKS TO FORCE PLAINTIFF
 TO REMAIN HERE TO BE BASICALLY TORTURED
 ABUSED AND PERMANENTLY HARMED, AND
 SLOWLY STARVING AND POSSIBLE DEB OF
 DENIED ASTHMA MEDICATION AND TREATMENT
 OR HEAD TRAUMA --

16) COI. O'BOYLE, COI. MEYER, COI. CRESS,
 COI. GORMAN, COI. MORRIS, COI. STORM, COI.
 SIMSON YOU ARE OF SEVERAL OFFICERS AND
 JOHN DOES WHO HAVE CONSPIRED TO VOUCH FOR
 EACH OTHERS FABRICATED FAUSE ALLEGATIONS,
 YOU HAVE DENIED A MEAL A DAY, ALL SHOWERS,
 LAW LIBRARY AND MOVEMENT WITH YOUR FALSE
 REPORTS AND YOUR INTENTIONAL ABUSE OF DUTIES,
 DO NOT DO IT AGAIN

TO OBSTRUCT AND INTERFERE WITH THE PLAINTIFFS GOVERNMENT FUNCTIONS, YOUR INTENTIONALLY ABUSING A LOOP HOLE TO KEEP PLAINTIFF FROM HIS SECURITY TRANSFER, YOUR INTENTIONALLY SLOWLY STARVING PLAINTIFF BY DENYING A MEAL A DAY AND FALSELY REPORTING I'M DENYING SAID MEAL, YOUR ENGAGING IN A CONSPIRACY TO DENY THE PLAINTIFF ACCESS AND USE OF THE GRIEVANCE PROCEDURE, YOUR THREATENING AND HARASSING AND TRYING TO INTIMIDATE PLAINTIFF TO DROP HIS COURT AND PRISON COMPLAINTS, AND YOUR ENGAGING IN INTENTIONAL CONSPIRACY WITH OFFICERS WHO PLAINTIFF HAD PRIORLY HAD SERIOUS AND SOME VIOLENT INTERACTIONS WITH WHILE OUT SIDE OF PRISON, WHO ARE USING THEIR NEW OFFICIAL POWER TO MAKE EVERY LAST ASPECT OF PRISON AS MISERABLE AS POSSIBLE, TO STEAL AND DESTROY PERSONAL PROPERTY, TAKE APART MY CELL AT EVERY CHANCE, AND SEGREGATE ME IN A CELL FOR MY ENTIRE SENTENCE ALONE, WITH NO CONTACT WITH FAMILY OR OTHER INMATES--

DAMAGES

ID, TO WIT YOUR AILENMANCING THE EFFECTS OF THE PHYSICAL DAMAGES PLAINTIFF HAS SUFFERED OVER THE LAST YEAR-- YOUR PSYCHOLOGICALLY DAMAGING THE PRE-EXISTING WITH NEW WORSENING TRAUMA UPON PLAINTIFF, PLAINTIFF IS SCARED, UNABLE TO SLEEP, HAS NIGHTMARES, IS AWAKEN UP, AND DURING THE DAY WHILE AWARE BECOMING REAL JUMPY AND SHOCKED BY ANY SLIGHT NOISE OR STAFF INTERACTION, PLAINTIFF IS REAL STIFF AND UNMOBILE FOR A GOOD PART OF THE DAY PLAINTIFF IS WAKEN AT NIGHT GASPING FOR AIR, HAS CRIES AND SHOKE WITH UNCONTROLLED ANXIETY AND FEAR UNDER HIS BUNK FOR HOURS, A FEW DAYS A WEEK FOR THE LAST 7 OR SO WEEKS,

TO WIT PLAINTIFF SEEKS \$500,000 IN DOLLARS AGAINST EACH DEFENDANT IN THIS SUPPLEMENTAL COMPLAINT, FOR EACH MALICIOUS ACT AND FAILURE TO ACT CLAIMED HEREIN AGAINST YOU IN YOUR OFFICIAL AND INDIVIDUAL CAPACITY, IN THE NATURE OF PUNITIVE AND COMPENSATORY DAMAGES--

PLAINTIFF SEEKS THE SUPERVISORY OF SCI-FRACKVILLE, THE OFFICE OF THE SECURITY AT SCI-FRACKVILLE, AND THE CHIEF OF SPECIAL INVESTIGATIONS OF CENTRAL OFFICE TO TAKE IMMEDIATE ACTION TO TRANSFER PLAINTIFF OUT OF SCI-FRACKVILLE--

PLAINTIFF SEEKS COSTS OF LITIGATION
AND THE ISL OTHER EQUITABLE RELIEF AND JUST RELIEF
COURT SEES PROPER
BY COURTS ORDER OR THIS REQUEST -
PLAINTIFF SEEKS AN IMMEDIATE CONFERENCE
WITH THE SCHUYLKILL COUNTY DA. OFFICE AND
THE ATTORNEY GENERAL OFFICE TO PURSUE
CRIMINAL CHARGES FOR SEVERAL CRIMINAL
VIOLATIONS RELATED TO OBSTRUCTION AND
INTERFERENCE OF LAW AND GOVERNMENTAL
FUNCTIONS PURSUANT TO 18 PA. CSA § 3701; FOR
FABRICATION OF FALSE EVIDENCE AND TAMPERING WITH
EVIDENCE PURSUANT TO 18 PA. CSA § 4910; FOR
AGGRAVATED HARASSMENT PURSUANT TO 18 PA. CSA. § 3707
FOR THREATS AND OTHER IMPROPER INFLUENCE
IN OFFICIAL AND POLITICAL MATTERS 18 PA. CSA. §
4708; FOR THEFT 18 PA. CSA § 3927; AND FOR OTHER
SEXUAL ASSAULTIVE ACTS - P.R.I.A VIOLATIONS -
I WANT PURSUED ALL AGAINST THESE
DEFENDANTS OR THIS CIVIL ACTION EVERY
LAST DEFENDANT ABOUT 30 TOTAL FOR THEIR
ACTIONS - -

THE SCREEN IS TRUE AND CORRECT

SERVICE BY SUMMONS - BY PROTHONOTARY

BY PLAINTIFF
JASON CEE NAWA #M20864
SCR - FRACKVILLE
111 ALTA MONT BOULEVARD
FRACKVILLE PA. 17931

JS/ Josten

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**IN THE COURT OF COMMON PLEAS
OF SCHUYLKILL COUNTY, PENNSYLVANIA**

JASON CIENIAWA,	:
Plaintiff	:
	No. 20-0305
v.	:
	:
KATHY BRITTAINE, JAMES MEINTEL, MICHAEL GOURLEY, KAREN HOLLY – MEDICAL, MARY JOY MONSALUDE, CO2 SHULTZ – C-BLOCK, CO1 LUCAS – C-BLOCK, SANKAS – MAINTENANCE, CO3 LT. HANNON, PA. TONY – MEDICAL, JOHN DOES, JANE DOES OF SCI FRACKVILLE and JOSEPH SILVA OF CENTRAL OFFICE,	:
Defendants	:

**PRAECIPE TO CONSENT TO AMENDMENT OF
COMPLAINT**

To the Prothonotary:

Plaintiff Jason Cieniawa filed a “Supplemental” Complaint that is construed as an amended complaint on October 16, 2020 without seeking leave of Court. The Amended Complaint was served on Defendants October 22, 2020. Pursuant to Pennsylvania Rule of Civil Procedure 1033(a), Plaintiff is to seek consent of the adverse party prior to filing an amended complaint. Please consider this praecipe as granting consent to the amendment of the complaint.

Respectfully submitted,

**JOSH SHAPIRO
Attorney General**

By:


**ALLISON L. DEIBERT
Deputy Attorney General
Attorney ID 309224**

**Office of Attorney General
15th Floor, Strawberry Square
Harrisburg, PA 17120**

Phone: (717) 705-2532
adeibert@attorneygeneral.gov

Date: October 23, 2020

KAREN M. ROMANO
Chief Deputy Attorney General
Civil Litigation Section

**Counsel for Defendants Brittain, Meintel,
Gourley, Holly, Schultz, Lucas, Sankus,
Hannon and Silva**

CERTIFICATE OF COMPLIANCE

I, Allison Deibert, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.


ALLISON DEIBERT
Deputy Attorney General

**IN THE COURT OF COMMON PLEAS
OF SCHUYLKILL COUNTY, PENNSYLVANIA**

JASON CIENIAWA,	:
Plaintiff	:
	No. 20-0305
v.	:
	:
KATHY BRITTAINE, JAMES MEINTEL, MICHAEL GOURLEY, KAREN HOLLY – MEDICAL, MARY JOY MONSALUDE, CO2 SHULTZ – C-BLOCK, CO1 LUCAS – C-BLOCK, SANKAS – MAINTENANCE, CO3 LT. HANNON, PA. TONY – MEDICAL, JOHN DOES, JANE DOES OF SCI FRACKVILLE and JOSEPH SILVA OF CENTRAL OFFICE,	:
Defendants	:

CERTIFICATE OF SERVICE

I, Allison L. Deibert, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on October 23, 2020, I caused to be served a true and correct copy of the foregoing document titled Praeclipe to Consent to Amendment of Complaint to the Plaintiff through the Department of Corrections. This alternative method of service is being used due to COVID-19.

VIA U.S. MAIL

**Jason Cieniawa, MZ-0869
SCI Frackville
*Pro Se Plaintiff***


ALLISON L. DEIBERT
Deputy Attorney General